



Fw: Wampus
Stephanie Carr to: Glenn Pizzarella

07/19/2011 10:24 AM

From: Jim Pfeifer <Jim.Pfeifer@erm.com>
To: Arthur Morris <amorris@hygenix.com>
Cc: "director@raquettelake.com" <director@raquettelake.com>, "Mikegroo@aol.com" <Mikegroo@aol.com>, "Shteynberg, Gennady" <Gennady.Shteynberg@ct.gov>, Stephanie Carr/R1/USEPA/US@EPA
Date: 07/14/2011 10:55 AM
Subject: RE: Wampus

Hi, Art. I spoke to Gene Shteynberg and Stephanie Carr (EPA) for about ½-hour. The topic was the closure of the RCRA units, and overall Site closure (RSRs & Corrective Action). The 3 RCRA units (two unlined surface impoundments and a concrete tank) were not "clean closed" back in the 1980's, since GW was still being monitored (for Cd and Pb primarily). However, the sludge and soil in the impoundments was removed and the initial soil data (HRP) indicated compliance with the then applicable soil criteria. When I got involved in 2000/01, we again sampled the soil in the impoundments and the soil below and around the concrete holding tank, since the standard of care under the RSRs is of course different, and also from a data quality perspective. The soil in/below the RCRA Units was confirmed to be in compliance with the applicable RSR soil criteria. This work was done in conjunction with a Site-wide AOC-by AOC assessment, and remediation (where required). That work was documented in the report I forwarded to you last week. Some follow-on investigation and spot remediation work was completed to address some data gaps, as summarized in the later reports you have, and we are now at a point of looking at a final closure/compliance path for the Site, and there is very little left to do over the next few years.

Gene and Stephanie provided the following feedback:

- The Site (Lot 1) can be closed out under the RSRs, and RCRA CA, and the work performed to date is sufficient to do so, once the GW monitoring is completed and the ELURs are filed;
- Worst case is that additional annual or semi-annual GW monitoring will be required after the initial 2 yrs (GB area);
- They do want the ECO checklist completed for Lot 1, even though Lot 2, a separate property, is clearly more of a risk in terms of Ecological issues, since there s still some soil remediation to complete on Lot 2, and Lot 2 borders stubby Plain Brook;
- The groundwater monitoring that was required to close out the RCRA units (17 of the initially required 30 years of GW monitoring was competed) will not be required, and the RSR-required monitoring will be sufficient and will allow for a demonstration of equivalency with the RCRA program;
- We will only have to document closure of the RCRA units, and no additional data is necessary;
- They agreed that there are no limitations to the use of Lot 1 (Industrial/Commercial zoning), and they were completely in agreement that very little work is left to complete on Lot 1.

Clearly, this was a large and complicated Site, but I have been involved for the past 10 years, and worked closely with CT DEP and EPA to arrive at the point we are at now (CT DEP has retained oversight btw – Gene has been hinting at delegating it to me, but it has not officially happened). There is very little remaining liability in terms of the historical environmental issues, and absolutely no limitations that would impact the owner's ability to lease/use the building/ property (which I would think is one of the bank's biggest concerns. The ELURs will simply limit residential use (who cares), and restrict disturbance of soil below a small portion of the building (AOC-5).

If you would like to discuss further, please do not hesitate to contact me.

Regards,

Jim

James L. Pfeifer, LEP
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From: Arthur Morris [mailto:amorris@hygenix.com]
Sent: Wednesday, July 13, 2011 3:11 PM
To: Jim Pfeifer
Subject: RE: Wampus

Jim

Re: Wampus Lane

As a follow-up to my telephone message,
could you provide an overview of your discussion
with Stephanie Carr and Gennady Shetyenberg.

Thanks

At Morris
Hygenix, Inc.

From: Jim Pfeifer [mailto:Jim.Pfeifer@erm.com]
Sent: Monday, July 11, 2011 9:58 AM
To: Stephanie Carr; Shteynberg, Gennady
Cc: director@raquettelake.com; Arthur Morris; Mikegroo@aol.com
Subject: RE: Wampus

Stephaine, thanks for the response. The main reason I want to discuss the project is related to the RCRA Corrective Action (RCRA CA) requirements. I am comfortable with the RSRs, and the need to monitor GW and apply the required ELURs on Lot 1, but I do want to be sure I understand what is needed to document closure under RCRA CA. We have discussed this in the past, and it was my understanding that the Site could be closed under the RSRs, and that we would be able to demonstrate equivalency in terms of RCRA CA. However, since this is still a DEP-lead Site, a discussion would be helpful in trying to quantify the effort remaining on Lot 1.

I am also available to talk tomorrow before 2:30. Gene?

Regards,

Jim

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From: Stephanie Carr [mailto:Carr.Stephanie@epamail.epa.gov]
Sent: Monday, July 11, 2011 8:32 AM
To: Shteynberg, Gennady
Cc: Jim Pfeifer
Subject: RE: Wampus

Gene and Jim,

I wasn't sure if Gene was referring to not doing it earlier than Thurs. last week (7/7) or this week. I am available today (Mon 7/11) between 10 am and 12:30 pm or tomorrow (Tues 7/12) anytime before 2:30. I have some availability next week too, so let me know if you'd prefer to do it then.

Thanks, Stephanie

Stephanie C. Carr
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RE: Wampus

Shteynberg, Gennady

to: 'Jim Pfeifer'

07/05/2011 09:30 PM

Cc: Stephanie Carr

Hi Jim,

Format of the meeting seems good.

But not earlier than next Thursday, if it is ok with Stephanie and you.

Please provide a summary of your proposals before the meeting.

Thanks, Gene

From: Jim Pfeifer [<mailto:Jim.Pfeifer@erm.com>]

Sent: Tuesday, July 05, 2011 3:01 PM

To: Shteynberg, Gennady

Cc: Carr.Stephanie@epamail.epa.gov

Subject: Wampus

Gene & Stephanie, I would like to touch base with you regarding the Lot 1 closure, and specifically documenting that we have satisfied the RCRA CA program. I have been focusing on the RSRs in terms of characterization and remediation of the Site (Lot 1), and the Site has been fully characterized and remediated where necessary to meet the RSRs (with a few ELURs remaining to be filed, and GW monitoring requirements). Also, as far as I know, the Site is still DEP (DEEP)-Lead.

You have historically provided approval of the work we have completed and in terms of GW monitoring, only that required under the RSRs was contemplated. I would like to discuss with you the remaining information required to document that we have also fulfilled what is required under the RCRA CA program. Would you be available to talk this week? I would like to meet with Gene at his office, and have Stephanie take part by phone, which I think makes most sense.

Thanks,

Jim

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